

REMARKS

Claims 10, 11 and 14-16 are amended. Claims 1, 6, 7, 9, 17, 25-27 and 29-32 are canceled. Claims 33-52 have been added. Claims 10, 11, 14-16, and 33-52 are pending in the application. The amendments as indicated herein do not add any new matter to this application.

CLAIMS 1, 6, 7, 9-11, 14-17, 25-27 AND 29-32 – FREED

Claims 1, 6, 7, 9-11, 14-17, 25-27 and 29-32 were rejected under 35 U.S.C. § 102(e) as being anticipated, allegedly, by Freed, et al., U.S. Patent No. 7,039,053 B1 (*Freed*). All of these rejections are traversed, respectfully, for at least the reasons discussed below.

Since Claims 1, 6, 7, 9, 17, 25-27 and 29-32 have been cancelled, the rejection to those particular claims is thus moot. However, newly added claims such as independent Claims 33, 36, 37 and 45 and the dependent claims thereof recite features of Claim 1, 9, 17, 25 and 26, and their previous dependent claims, the discussion herein addresses features of these newly added claims that are distinguishable from *Freed*.

Claim 33

Claim 33 recites, among other features, “**identifying first sub-entries in a first access control list**, wherein the first access control list comprises first entries, and wherein the first sub-entries identified from the first access control list comprise (i) disjoint entries of the first entries or (ii) overlapping sections identified from the first entries or (iii) non-overlapping sections identified from the first entries; programmatically determining whether the first access control list is functionally

equivalent to a second access control list by determining whether each of the first sub-entry in the first access control list is equivalent to or contained by one or more entries of the second access control list" (emphasis added).

Neither *Chase* nor *Arrow* teaches, discloses or suggests all the features of Claim 33.

Comparing Two Access Control Lists

Freed fails to disclose any feature relating to comparing two access control lists. *Freed* discloses a method to determine the validity of a policy table in a router (Abstract). The method determines whether any particular policy rule in the policy table intersects with any other policy rule in the same policy table (*Id.*). Therefore, even if the policy table in *Freed* were analogous to an access control list in Claim 33, *Freed* cannot possibly disclose comparing two access control lists as claimed by Claim 33, since *Freed* does not disclose any feature relating to comparing policy tables.

Identifying Sub-Entries and Using the Sub-Entries

Claim 33 features identifying sub-entries from entries in a first access control list before comparing it with a second access control list. The sub-entries comprise (i) disjoint entries of the first entries or (ii) overlapping sections identified from the first entries or (iii) non-overlapping sections identified from the first entries.

Overlapping sections and non-overlapping sections are a result of decomposing the first entries in the first access control list, and do not appear as entries in the first access control list in the first place. Furthermore, in Claim 33, the comparison between the first access control list and a second access control list uses the sub-entries, not the first entries.

Freed fails to disclose **any feature relating to identifying or using sub-entries**.

As noted above, *Freed* discloses a method that determines whether **any particular policy rule** in the policy table intersects with **any other policy rule** in the same policy table.

The Office Action asserts that a passage in *Freed* discloses sub-entries (col. 5 lines 18-29). However, that passage recites in its entirety:

Thus, during on-line operation, when the router receives a new packet, the packet is first checked to see if it matches the first rule in the table--that is, if each of the packet's parameters fall within the ranges specified by the first rule. For example, a packet with a source IP address of 149.112.240.168, a destination IP address of 128.153.4.200, any source port, and a destination port of 25 would match rule 1 in table 40 of FIG. 3, so the packet will be assigned a low priority. If a packet doesn't match any rule in the table, the last rule (such as rule 6 in table 40) will be applied to the packet by default after the packet has been compared to all the other rules in the table.

Clearly, this passage fails to disclose any feature relating to sub-entries recited in Claim 33. Therefore, even if the policy rule in *Freed* were analogous to an entry in the first access control list in Claim 33, *Freed* still fails to disclose a feature of sub-entries, let alone a step of identifying sub-entries, as claimed in Claim 33.

Furthermore, since *Freed* fails to disclose identifying sub-entries from first entries in a first access control list, it cannot possibly disclose using sub-entries, identified from entries in the first access control list, as a basis for comparing two access control lists, as claimed in Claim 33.

Claims 36, 37 and 45

Claims 36, 37 and 45 each recite similar features as those discussed above with respect to Claim 33. Claims 36, 37 and 45 are recited in a format allowable by 35 USC §112, and correspond to method Claim 33 discussed above. Claims 37 and 45 are apparatus claims that each correspond to method Claim 33. Therefore, Applicants respectfully submit that Claims 36, 37 and 45 are patentable for at least the same reasons discussed above as to Claim 33.

Claims 10, 11, 14-16, 34, 35, 38-44, and 46-52

Each of Claims 10, 11, 14-16, 34, 35, 38-44, and 46-52 contains all the features of Claim 33, 37 and 45 discussed above and are patentable for the same reasons discussed above with respect to Claim 33, 37 and 45. Further, Claims 10, 11, 14-16, 34, 35, 38-44, and 46-52 feature limitations that individually render them patentable. Due to the fundamental differences already identified, a separate discussion of those features is not included at this time. For all the foregoing reasons, Applicants respectfully submit that Claims 10, 11, 14-16, 34, 35, 38-44, and 46-52 are allowable over the cited references.

INTERVIEW SUMMARY

The Applicant thanks the Examiners for the Interview conducted on August 9, 2006. The interview was between Examiners Aravind K. Moorthy and Syed Zia and the Applicants' Representatives, Chris J. Brokaw and Zhichong Gu. Pending Claim 33 and its dependents were discussed along with U.S. Patent No. 7,039,053 issued to Freed et al. No agreement was reached.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

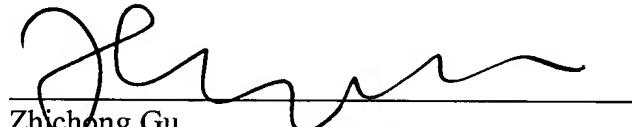
The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

on Aug. 9, 2006

by Martina Placid
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